

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 05-cv-329-GKF-SH
)	
TYSON FOODS, INC., et al.,)	
)	
Defendants.)	

**THE STATE OF OKLAHOMA’S OBJECTIONS TO THE ADMISSIBILITY OF
DEFENDANTS’ UPDATED JOINT EXHIBIT LIST**

The State of Oklahoma (“the State”) respectfully submits the following objections to the Admissibility of Defendants’ Updated Joint Exhibit List (attached hereto as Ex. 1) that was untimely served on the State on December 2, 2024. The State reserves the right to amend or supplement this their objections to Defendants’ updated joint exhibit list.

Exhibit Number	Description	Objections (If Any)
DJX2-0001	Cobb-Vantress Inc.’s Second Supplemental and Fourth Amended Response to Plaintiffs’ First Set of Interrogatories	Hearsay
DJX2-0002	Tyson’s Chicken, Inc.’s Second Supplemental and Fourth Amended Response to Plaintiffs’ First Set of Interrogatories	Hearsay
DJX2-0003	Tyson Food Inc.’s Second Supplemental and Fourth Amended Response to Plaintiffs’ First Set of Interrogatories	Hearsay
DJX2-0004	Tyson Poultry Inc.’s Second Supplemental and Fourth Amended Response to Plaintiffs’ First Set of Interrogatories	Hearsay
DJX2-0005	Appendix A - Examples of STP Reports with STP > 65 (CLEAN)	
DJX2-0006	Cobb-Vantress Inc.’s Second Supplemental and Fourth Amended Response to Plaintiffs’ First Set of Interrogatories (Strikethroughs)	Hearsay

Exhibit Number	Description	Objections (If Any)
DJX2-0007	Tyson's Chicken, Inc.'s Second Supplemental and Fourth Amended Response to Plaintiffs' First Set of Interrogatories (Strikethroughs)	Hearsay
DJX2-0008	Tyson Food Inc.'s Second Supplemental and Fourth Amended Response to Plaintiffs' First Set of Interrogatories (Strikethroughs)	Hearsay
DJX2-0009	Tyson Poultry Inc.'s Second Supplemental and Fourth Amended Response to Plaintiffs' First Set of Interrogatories (Strikethroughs)	Hearsay
DJX2-0010	Appendix A - Examples of STP Reports with STP > 65 (with Strikethroughs)	Hearsay/foundation/marginalia/relevance
DJX2-0011	24-10-9 WTS ANRD Upper Illinois WMP	Foundation
DJX2-0012	AG Letter - John Tucker	Relevance
DJX2-0013	Arkansas Illinois River WMP Final 2012	Foundation
DJX2-0014	BMPs - IRW Litter Exports Calendar Year 2022	Foundation/hearsay/improper 1006 exhibit
DJX2-0015	BMPs - IRW Litter Exports January through September 2024	Foundation/hearsay/improper 1006 exhibit
DJX2-0016	BMPs AR Aging Summary (10/11/2024)	Foundation/hearsay/improper 1006 exhibit
DJX2-0017	BMPs Balance Sheet (9/30/2024)	Foundation/hearsay/improper 1006 exhibit
DJX2-0018	BMPs Report - Annual Litter Exports IRW 2005-2023	Foundation/hearsay/improper 1006 exhibit
DJX2-0019	Cargill - Letter to General Gentner Drummond	Relevance
DJX2-0020	Expert Report Illinois River Watershed Water Quality and Source Assessment prepared by J. Connolly (Quantitative Environmental Analysis) for Illinois River Watershed Joint Defense Group - Final 2009 report	Hearsay/relevance/undisclosed expert opinions/ foundation
DJX2-0021	Connolly Expert Report (Errata)	Hearsay/relevance/undisclosed expert opinions/ foundation
DJX2-0022	Damages - Assessment - Connolly	Hearsay/relevance/undisclosed expert opinions/foundation
DJX2-0023	T. King, Identification & Evaluation of Viable Remediation Alternatives to Address Injuries to Land Disposal of Poultry Waste Within the Illinois River Watershed (5/15/2008) ("King Final Report")	Relevance

Exhibit Number	Description	Objections (If Any)
DJX2-0024	IRW Litigation - BMP Litter Exports (2010-2022)	Foundation/hearsay/improper 1006 exhibit
DJX2-0025	IRW Litigation - Plaintiffs Trial Ex 2535 (2003-2006 Exports Including BMPs Inc Haulers)	Relevance
DJX2-0026	OCC Poultry Litter Report 2001	Relevance to the extent this information is pre-2010
DJX2-0027	OCC Poultry Litter Report 2002	Relevance to the extent this information is pre-2010
DJX2-0028	OCC Poultry Litter Report 2003	Relevance to the extent this information is pre-2010
DJX2-0029	OCC Poultry Litter Report 2004	Relevance to the extent this information is pre-2010
DJX2-0030	OCC Poultry Litter Report 2005	Relevance to the extent this information is pre-2010
DJX2-0031	OCC Poultry Litter Report 2006	Relevance to the extent this information is pre-2010
DJX2-0032	OCC Poultry Litter Report 2007	Relevance to the extent this information is pre-2010
DJX2-0033	OCC Poultry Litter Report 2008	Relevance to the extent this information is pre-2010
DJX2-0034	OCC Poultry Litter Report 2009	Relevance to the extent this information is pre-2010
DJX2-0035	OCC Poultry Litter Report 2010	
DJX2-0036	OCC Poultry Litter Report 2011	
DJX2-0037	OCC Poultry Litter Report 2012	
DJX2-0038	OCC Poultry Litter Report 2013	
DJX2-0039	OCC Poultry Litter Report 2014	
DJX2-0040	ODAFF Poultry Litter Report 2017-2018	Foundation
DJX2-0041	J. Payne, Oklahoma State Univ., Poultry Litter Nutrient Management A Guide For Producers And Applicators (E-1027)	Hearsay, foundation
DJX2-0042	Declaration of T. J. Sullivan (2/7/2008)	Hearsay/relevance/undisclosed expert opinions/foundation
DJX2-0043	Expert Report of T. J. Sullivan (1/29/2009)	Hearsay/relevance/undisclosed expert opinions/foundation

Exhibit Number	Description	Objections (If Any)
DJX2-0044	Agricultural Environmental Management – ODAFF	This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use.
DJX2-0045	Nutrient Management Planning - Arkansas Department of Agriculture	This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use.
DJX2-0046	Nutrient Management Program - Arkansas Department of Agriculture	This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use.
DJX2-0047	Nutrient Management Training - Arkansas Department of Agriculture	This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use.
DJX2-0048	Poultry Waste Management Education - Oklahoma State University	This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know

Exhibit Number	Description	Objections (If Any)
		what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use.
DJX2-0049	Poultry Waste Management Publications - Oklahoma State University	This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use. Foundation/Hearsay to the extent Defendants intend to move literature/publications into evidence.
DJX2-0050	2014 Arkansas Natural Resources Commission, Final Report on County Registration	Foundation, improper 1006 exhibit
DJX2-0051	2015 Arkansas Natural Resources Commission, Final Report on County Registration	Foundation, improper 1006 exhibit
DJX2-0052	2016 Arkansas Natural Resources Commission, Final Report on County Registration	Foundation, improper 1006 exhibit
DJX2-0053	2017 Arkansas Natural Resources Commission, Final Report on County Registration	Foundation, improper 1006 exhibit
DJX2-0054	2018 Arkansas Natural Resources Commission, Final Report on County Registration	Foundation, improper 1006 exhibit
DJX2-0055	Spreadsheet, Annual Poultry Litter Applied for Benton and Washington Counties	Foundation, improper 1006 exhibit, hearsay
DJX2-0056	Spreadsheet, Benton and Washington Co. TRW 2014-2019	Foundation, improper 1006 exhibit, hearsay
DJX2-0057	Spreadsheet, Benton County TRW Tnfo 14-19	Foundation, improper 1006 exhibit, hearsay

Exhibit Number	Description	Objections (If Any)
DJX2-0058	Spreadsheet, Copy of TRW 12 Digit HUCs	Foundation, improper 1006 exhibit, hearsay
DJX2-0059	Spreadsheet, Crawford Co. TRW Tnfo 14-19	Foundation, improper 1006 exhibit, hearsay
DJX2-0060	Spreadsheet, TRW Benton and Washington County 2019 PFO	Foundation, improper 1006 exhibit, hearsay
DJX2-0061	Spreadsheet, Washington Co. TRW info 14-19	Foundation, improper 1006 exhibit, hearsay
DJX2-0062	S. Chandler PFO - Tyson Foods	Relevance – pre-2010
DJX2-0063	K. Glenn PFO - George's Tnc.	Relevance – pre-2010
DJX2-0064	R. Longshore PFO - Simmons Foods	Relevance – pre-2010
DJX2-0065	J. & C. Parker PFO - Cobb-Vantress	Relevance – pre-2010
DJX2-0066	R. & S. Reed PFO - George's Tnc.	Relevance – pre-2010
DJX2-0067	R. Ritchie PFO - Simmons Foods	Relevance – pre-2010
DJX2-0068	E. Ross PFO - Tyson Foods	Relevance – pre-2010
DJX2-0069	R. Schwabe PFO - Cargill	Relevance – pre-2010
DJX2-0070	R. Teague PFO - Cobb-Vantress	Relevance – pre-2010
DJX2-0071	M. Vue PFO - Cobb-Vantress	Relevance – pre-2010.
DJX2-0072	C. Williams PFO - Tyson Foods	Relevance – pre-2010
DJX2-0073	S. Adair PFO - Tyson Foods	Relevance – pre-2010
DJX2-0074	C. & H. Alewine PFO - Tyson Foods	Relevance – pre-2010
DJX2-0075	V. Bailey PFO - Simmons Foods	Relevance – pre-2010
DJX2-0076	S. Chandler PFO - Tyson Foods	Relevance – pre-2010

Exhibit Number	Description	Objections (If Any)
DJX2-0077	R. Collins PFO - Simmons Foods	Relevance – pre-2010
DJX2-0078	J. Doyle PFO - Simmons Foods	Relevance – pre-2010
DJX2-0079	J. Enneking PFO - Simmons Foods	Relevance – pre-2010
DJX2-0080	K. Glenn PFO - George's Inc.	Relevance – pre-2010
DJX2-0081	L. Hampton PFO - Cal-Maine Foods	Relevance – pre-2010
DJX2-0082	K. Ketkeo PFO - Tyson Foods	Relevance – pre-2010
DJX2-0083	K. Ketkeo PFO - Tyson Foods	Relevance – pre-2010
DJX2-0084	D. Lee PFO - Simmons Foods	Relevance – pre-2010
DJX2-0085	B. Littlejohn PFO - Tyson Foods	Relevance – pre-2010
DJX2-0086	B. Longshore PFO - Tyson Foods	Relevance – pre-2010
DJX2-0087	B. Longshore PFO - Tyson Foods	Relevance – pre-2010
DJX2-0088	R. Longshore PFO - Simmons Foods	Relevance – pre-2010
DJX2-0089	R. Longshore PFO - Simmons Foods	Relevance – pre-2010
DJX2-0090	L. McGarrah PFO - Tyson Foods	Relevance – pre-2010
DJX2-0091	D. Morris PFO - Cal-Maine Foods	Relevance – pre-2010
DJX2-0092	X. Moua & Y. Yang PFO - Tyson Foods	Relevance – pre-2010
DJX2-0093	X. Moua & Y. Yang PFO - Tyson Foods	Relevance – pre-2010
DJX2-0094	D. Mullin PFO - Tyson Foods	Relevance – pre-2010
DJX2-0095	E. & J. Noblin PFO - Tyson Foods	Relevance – pre-2010
DJX2-0096	E. & J. Noblin PFO - Tyson Foods	Relevance – pre-2010
DJX2-0097	B. Nubbie PFO - Tyson Foods	Relevance – pre-2010

Exhibit Number	Description	Objections (If Any)
DJX2-0098	J. Parker PFO - Cobb-Vantress	Relevance – pre-2010
DJX2-0099	J. Parker PFO - Cobb-Vantress	Relevance – pre-2010
DJX2-0100	L. Patterson PFO - Tyson Foods	Relevance – pre-2010
DJX2-0101	J. Reed PFO - Simmons Foods	Relevance – pre-2010
DJX2-0102	R. Reed PFO - George's Inc.	Relevance – pre-2010
DJX2-0103	R. Ritchie PFO - Simmons Foods	Relevance – pre-2010
DJX2-0104	E. Ross PFO - Tyson Foods	Relevance – pre-2010
DJX2-0105	E. Ross PFO - Tyson Foods	Relevance – pre-2010
DJX2-0106	R. Schwabe PFO - Cargill	Relevance – pre-2010
DJX2-0107	R. Schwabe PFO - Cargill	Relevance – pre-2010
DJX2-0108	B. Snyder PFO - Simmons Foods	Relevance – pre-2010
DJX2-0109	O. Swepston PFO - Tyson Foods	Relevance – pre-2010
DJX2-0110	R. Teague PFO - Cobb-Vantress	Relevance – pre-2010
DJX2-0111	B. Tomlinson PFO - Cal-Maine Foods	Relevance – pre-2010
DJX2-0112	R. Vaughn PFO - Cobb-Vantress	Relevance – pre-2010
DJX2-0113	K. Voss PFO - Simmons Foods	Relevance – pre-2010
DJX2-0114	M. Vue PFO - Cobb-Vantress	Relevance – pre-2010
DJX2-0115	C. Williams PFO - Tyson Foods	Relevance – pre-2010
DJX2-0116	C. Williams PFO - Tyson Foods	Relevance – pre-2010
DJX2-0117	L. Hampton PFO - Cal-Maine	Relevance – pre-2010
DJX2-0118	C. Masters PFO - Cargill	Relevance – pre-2010

Exhibit Number	Description	Objections (If Any)
DJX2-0119	B. Schwabe STP Report	Relevance – pre-2010, object to the extent the exhibit is illegible.
DJX2-0120	H. Knight PFO - Tyson Foods	Relevance – pre-2010
DJX2-0121	D. Mullin PFO - Tyson Foods	Relevance – pre-2010
DJX2-0122	J. Reed PFO - Simmons Foods	Relevance – pre-2010
DJX2-0123	R. Reed PFO - George's Inc.	Relevance – pre-2010
DJX2-0124	R. Teague PFO - Cobb-Vantress	Relevance – pre-2010
DJX2-0125	H. Alewine - OSU STP Report	Relevance – pre-2010
DJX2-0126	S. Chandler - OSU STP Report	Relevance – pre-2010
DJX2-0127	L. McGarrah - OSU STP Report	Relevance – pre-2010
DJX2-0128	B. Nubbie - OSU STP Report	Relevance – pre-2010
DJX2-0129	Arkansas Department of Agriculture Natural Resources Division Commissioner's Report (9/26/2024)	Foundation, objection to the extent this exhibit is only one section in the report and is incomplete
DJX2-0130	ansas Department of Agriculture, Upper Illinois River Watershed Management Plan (10/2024)	Foundation
DJX2-0131	Letter from B. Arthur, OK Secretary of Agriculture, to Hon. Judge G. Frizzell (9/5/2024)	Hearsay/relevance
DJX2-0132	Letter from W. Ward, AR Secretary of Agriculture, to Hon. Judge G. Frizzell (10/25/2024)	Hearsay/relevance
DJX2-0133	Watershed-Based Management Plan for the Upper Illinois River Watershed, Northwest Arkansas (7/17/2012)	Foundation
DJX2-0134	Arkansas River Basin Compact Arkansas-Oklahoma, 1970, A.C.A. § 15-23-401	
DJX2-0135	J. Seiger, ODAFF Summary Report on the Oklahoma Poultry Waste Movement (4/19/2019)	Foundation
DJX2-0136	J. Seiger, ODAFF Summary Report on the Oklahoma Poultry Waste Movement (2/24/2017)	Foundation

Exhibit Number	Description	Objections (If Any)
DJX2-0137	OAG News, Press Release, Drummond Lauds U.S. Supreme Court Decision to Consider Suit Over Biden Administration Rejection of Oklahoma's "Good Neighbor" Plan (10/21/2024)	Relevance/hearsay/foundation
DJX2-0138	S. Herron, University of Arkansas, Poultry Litter Management in the Illinois River Watershed of Arkansas & Oklahoma (FSA9535)	Relevance/hearsay/foundation
DJX2-0139	C. Penn, Oklahoma State University, An Alternative Poultry Litter Storage Technique for Improved Handling Transport and Application: The "Mass Reduction System" (PSS-2268) (2017)	Hearsay/foundation
DJX2-0140	Oklahoma State University Extension, Oklahoma Litter Market, Sellers and Service Providers (Summer 2022)	Hearsay/foundation
DJX2-0141	Second Statement of Joint Principles and Actions, Phosphorus in OK and AR	Marginalia/foundation, hearsay
DJX2-0142	P. Tomlinson, Tomlinson Proposal for 2014-2015 Kansas Fertilizer Research Fund	Hearsay/foundation/relevance
DJX2-0143	Oklahoma Extension: What is an NMP?, Oklahoma Extension Waste Management, Youtube Video, https://www.youtube.com/watch?v=SzF7MByuKvM	Hearsay/foundation
DJX2-0144	A. Oladeinde, Litter Commensal Bacteria Can Limit the Horizontal Gene Transfer of Antimicrobial Resistance to Salmonella in Chickens, 88 Applied and Environmental Microbiology (2022)	Hearsay/foundation
DJX2-0145	J. Isaacs, Manure Manager, Poultry litter: How old is too Old? (10/18/2021)	Hearsay/foundation
DJX2-0146	University of Georgia, Poultry Environmental Quality Handbook, Recycling of Poultry Litter	Hearsay/foundation
DJX2-0147	J. Smith, The Case for Built Up Litter in US Boiler Complexes, The Poultry Site (5/9/2017)	Hearsay/foundation
DJX2-0148	K. Thornton, Reservoir Limnology: Ecological Perspectives (1990)	Hearsay/foundation
DJX2-0149	D. Di Toro, Chesapeake Bay Sediment Flux Model (1993)	Hearsay/foundation

Exhibit Number	Description	Objections (If Any)
DJX2-0150	D. Nash, Effective Sediment-Transporting Discharge from Magnitude-Frequency Analysis, 102 J. Geo. 79 (1994)	Hearsay/foundation
DJX2-0151	C. Ziegler, Modeling Sediment Transport Dynamics in Thompson Island Pool, Upper Hudson River, 1 Water Quality & Ecosystem Modeling 193 (2000)	Hearsay/foundation
DJX2-0152	M. Vernon Carle, Patterns of Watershed Urbanization and Impacts on Water Quality, 41 J. Am. Water Res. Ass'n 693 (2005)	Hearsay/foundation
DJX2-0153	J. Withers, Delivery and cycling of phosphorus in rivers: A review. Science of the Total Environment 400, 379–395 (2008)	Hearsay/foundation
DJX2-0154	Watershed Based Plan for the Illinois River, Oklahoma Conservation Commission Water Quality Division (2010)	
DJX2-0155	J.T. Scott, Change Point Analysis of Phosphorus Trends in the Illinois River (Oklahoma) Demonstrates the Effects of Watershed Management, 40 Journal of Environmental Quality 1249–1256 (2011)	Hearsay/foundation
DJX2-0156	K. Cappiella et al., Strategies for Managing the Effects of Urban Development on Streams, National Water-Quality Assessment Program, U.S. Department of the Interior, U.S. Geological Survey Circular 1378 (2012)	Hearsay/foundation
DJX2-0157	H. Jarvie et al., Within-River Phosphorus Retention: Accounting for a Missing Piece in the Watershed Phosphorus Puzzle, Environmental Science & Technology (2012)	Hearsay/foundation
DJX2-0158	H. Jarvie et al., Supporting Information, Within-River Phosphorus Retention: Accounting for a Missing Piece in the Watershed Phosphorus Puzzle, Environmental Science & Technology (2012)	Hearsay/foundation
DJX2-0159	R. Olsen, Water Quality Sample Collection, Data Treatment and Results Presentation for Principal Components Analysis - Literature Review and Illinois River Watershed Case Study, 46 Water Research 3110-3122 (2012)	Hearsay/foundation/relevance
DJX2-0160	Second Statement of Joint Principles and Actions (2/20/2013)	Foundation/hearsay
DJX2-0161	Baylor University, Sponsored Programs Agreement (5/9/2014)	Foundation/hearsay

Exhibit Number	Description	Objections (If Any)
DJX2-0162	Appendix to King Final Report, Scenic Rivers Joint Phosphorus Study Data Portfolio (12/19/2016)	Relevance/foundation
DJX2-0163	The Water Research Foundation, Tertiary Phosphorus Removal (2019)	Hearsay/foundation
DJX2-0164	Illinois River Watershed Partnership, Streambank Erosion in the Illinois River Watershed (2020)	Foundation/hearsay
DJX2-0165	Illinois River and Tributaries: Streambank Erosion Sites and Analysis 2020 Report, Prepared by Natural State Streams LLC for The Illinois River Watershed Partnership (2021)	Foundation/hearsay
DJX2-0166	B.E. Haggard et al., Defining Critical or Hydrologic Conditions as Sampled During the Joint Study, Final Report Submitted to the Northwest Arkansas Regional Planning Commission (1/15/2021)	Foundation/hearsay
DJX2-0167	E. Grantz, Arkansas Water Resource Center, Constituent Loads and Trends in the Upper Illinois River Watershed: A Nonpoint Source Management Program Priority Watershed (2023)	Foundation/hearsay
DJX2-0168	Flow Data Files (Excel files)	Foundation/hearsay
DJX2-0169	HYSEP Data Files (Excel files)	Foundation/hearsay
DJX2-0170	Water Quality Data Files (Excel files)	Foundation/hearsay
DJX2-0171	WWTP Data Files (Excel Files)	Foundation/hearsay
DJX2-0172	Oklahoma Conservation Commission 2022 Litter Transfer Rules	
DJX2-0173	Oklahoma State University Extension Poultry Waste Management Education Fall 2024 Course Schedule	Relevance
DJX2-0174	C. Exley et al., A Mechanism for Acute Aluminum Toxicity in Fish, 151 J. Theory. Biol. 417-428 (1991)	Hearsay/foundation/relevance
DJX2-0175	2021 Population Estimates for Bentonville, Fayetteville, Rogers, and Springdale AR	Foundation/hearsay
DJX2-0176	W. Coblenz et al., Using Bermudagrass Forage Systems to Mine Phosphorus from	Hearsay/foundation/relevance

Exhibit Number	Description	Objections (If Any)
	High Soil-Test Phosphorus Soils, University of Arkansas	
DJX2-0177	S. Harrison et al., The Value of Poultry Litter to Farmers on Delmarva, Virginia Polytechnic Institute (2023)	Hearsay/foundation/relevance
DJX2-0178	R. Kadlec. Large Constructed Wetlands for Phosphorus Control, Water (2016)	Hearsay/foundation/relevance
DJX2-0179	M. Land et al., How Effective are Created or Restored Freshwater Wetlands for Nitrogen and Phosphorus Removal, Environmental Evidence (2016)	Hearsay/foundation/relevance
DJX2-0180	D. Miles et al., Atmospheric Ammonia is Detrimental to the Performance of Modern Commercial Broilers, 83 Poultry Science 1650 (2004)	Hearsay/foundation/relevance
DJX2-0181	P.A. Moore et al., Reducing Phosphorus Runoff and Improving Poultry Production with Alum, Poultry Science (1999)	Hearsay/foundation/relevance
DJX2-0182	P. Moore, Treating Poultry Litter with Aluminum Sulfate (Alum), USDA (2005)	Hearsay/foundation/relevance
DJX2-0183	P. Moore, Long-Term Effects of Poultry Litter, Alum-Treated Litter, and Ammonium Nitrate on Phosphorus Availability in Soils, Journal of Environmental Quality (2007)	Hearsay/foundation/relevance
DJX2-0184	M. Nelson et al., Illinois River Phosphorus Sampling Results, Arkansas Water Resources Center (2002)	Hearsay/foundation/relevance
DJX2-0185	Spreadsheet, NLCD NWI Wetlands (2008)	Hearsay/foundation/relevance
DJX2-0186	NLCD Urban Change Calculation	Hearsay/foundation/relevance
DJX2-0187	Penn & Zhang, Alum-Treated Poultry Litter as a Fertilizer Source, OSU	Hearsay/foundation/relevance
DJX2-0188	Playle & Wood, Water pH and Aluminum Chemistry in the Gil Micro-Environment of Rainbow Trout During Acid Aluminum Exposures, Journal of Comparative Physiology B (1989)	Hearsay/foundation/relevance
DJX2-0189	M. Riza et al., Control of Eutrophication in Aquatic Ecosystems by Sustainable Dredging, Case Studies in Chemical and Environmental Engineering (2023)	Hearsay/foundation/relevance
DJX2-0190	A.N. Sharpley et al., Managing Natural Process in Drainage Ditches for Nonpoint	Hearsay/foundation/relevance

Exhibit Number	Description	Objections (If Any)
	Source Phosphorus Control, Journal of Soil and Water Conservation (2007)	
DJX2-0191	O. Tamm, Internal phosphorus loading due to sediment anoxia in shallow areas: implications for lake aeration treatments, 82 Aquatic Sciences (2020)	Hearsay/foundation/relevance
DJX2-0192	Wetlands P Removal Area	Hearsay/foundation/relevance
DJX2-0193	R. Wilson, Swimming Performance, Whole Body Ions, And Gill Al Accumulation During Acclimation to Sublethal Aluminium in Juvenile Rainbow Trout, 10 Fish Physiology and Biochemistry 149-159 (1992)	Hearsay/foundation/relevance
DJX2-0194	PFO Data	Foundation, further objection to the extent the files are not readable
DJX2-0195	Washington County Report (10/31/2024)	Foundation
DJX2-0196	Arkansas-Oklahoma Arkansas River Compact Commission Environmental Committee Report (9/28/2023)	
DJX2-0197	M. Wilson, University of Arkansas, An Overview of Regulations for Nutrient Management on Livestock Farms in Arkansas (FSA9523)	Hearsay/foundation/relevance
DJX2-0198	J. Payne, et al., Oklahoma State University, Poultry Litter Nutrient Management: A Guide for Producers and Applicators (E-1027)	Hearsay/foundation/relevance
DJX2-0199	Arkansas Department of Agriculture, Upper Illinois River Watershed Management Plan (10/2024)	Foundation/hearsay
DJX2-0200	Economics of Transporting Poultry Manure and Litter, Poultry Environmental Quality Handbook	Hearsay/foundation/relevance
DJX2-0201	Illinois River Watershed Partnership, Our Mission (11/17/ 2024)	This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use.

Exhibit Number	Description	Objections (If Any)
		Further object as hearsay.
DJX2-0202	North American Lake Management Society, Flood & Drought, Fire & Ice Managing Lakes Under Changing Climates (11/5–8/2024)	<p>This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use.</p> <p>Further object as hearsay.</p>
DJX2-0203	T. Tabler & J. Wells, Poultry Litter Management, The Poultry Site (11/17/2012)	<p>This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use.</p> <p>Further object as hearsay.</p>
DJX2-0204	Field & Stream Magazine	<p>This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use.</p> <p>Further object on hearsay and foundation grounds.</p>
DJX2-0205	BMP's Success ~ The Litter Link ~ A Virtual Poultry Litter Bank - BMP's Success	<p>This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all</p>

Exhibit Number	Description	Objections (If Any)
		rights to object once Defendants identify what portion or portions of this website Defendants seek to use. Further object on hearsay and foundation grounds.
DJX2-0206	The Litter Link ~ A Virtual Poultry Litter Bank - Homepage	This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use. Further object on hearsay and foundation grounds.
DJX2-0207	2023 Arkansas Natural Resources Commission, Summary Registration	Foundation, hearsay, improper 1006 exhibit
DJX2-0208	2022 Arkansas Natural Resources Commission, Registration Summary	Foundation, hearsay, improper 1006 exhibit
DJX2-0209	2020 Arkansas Natural Resources Commission, Final Report on County Registration	Foundation, hearsay, improper 1006 exhibit
DJX2-0210	Aerials Data Files	Foundation, hearsay, object to the extent the files are unreadable. The State reserves all rights to object once Defendants seek to introduce these data files at trial.
DJX2-0211	Landuse Data Files	Foundation, hearsay, object to the extent the files are unreadable. The State reserves all rights to object once Defendants seek to introduce these data files at trial.
DJX2-0212	FY18 Poultry Registration Transfer Records NSA	Foundation/hearsay/improper 1006 exhibit
DJX2-0212-A	FY18 Poultry Registration Transfer Records NSA - In and Out of IRW	Untimely filed exhibit under Court's scheduling order.

Exhibit Number	Description	Objections (If Any)
		Foundation/hearsay/improper 1006 exhibit
DJX2-0213	FY19 Poultry Registration Transfer Records NSA	Foundation/hearsay/improper 1006 exhibit
DJX2-0214	FY20 Poultry Registration Transfer Records NSA	Foundation/hearsay/improper 1006 exhibit
DJX2-0215	FY21 Poultry Registration Transfer Records NSA	Foundation/hearsay/improper 1006 exhibit
DJX2-0216	FY22 Poultry Registration Transfer Records NSA	Foundation/hearsay/improper 1006 exhibit
DJX2-0217	Expert Report of John P. Connolly (11/2024)	Hearsay/foundation/relevance
DJX2-0218	All figures, charts, and exhibits included in the Expert Report of John P. Connolly (11/2024)	Hearsay/foundation/relevance/improper group exhibit
DJX2-0219	Expert Report of Todd McDonnell & Timothy Sullivan (11/2024)	Hearsay/foundation/relevance
DJX2-0220	All figures, charts, and exhibits included in the Expert Report of Dr. Todd McDonnell & Dr. Timothy Sullivan (11/2024)	Hearsay/foundation/improper group exhibit
DJX2-0221	Expert Report of Dimitrios Vlassopoulos (11/2024)	Hearsay/foundation/relevance
DJX2-0222	All figures, charts, and exhibits included in the Expert Report of Dimitrios Vlassopoulos (11/2024)	Hearsay/foundation/relevance/improper group exhibit
DJX2-0223	Current Status of Growers Identified in Cargill Turkey Production's Response to the State's First Interrogatory (11/15/2024)	Foundation/hearsay/relevance
DJX2-0224	Cargill Turkey Production Contract with MBK Farm (12/18/2023)	Foundation/hearsay/relevance
DJX2-0225	Cargill Turkey Production Contract with KD Farms (9/29/2017)	Foundation/hearsay/relevance
DJX2-0226	Cargill Turkey Production Contract with Yellowstone South LLC (1/4/2021)	Foundation/hearsay/relevance
DJX2-0227	Cargill Turkey Production Contract with Yellowstone Turkey dba West Farm (1/2/2024)	Foundation/hearsay/relevance
DJX2-0228	Keith and Jerri Mitchell Nutrient Management Plan expiring 2029 (5/23/2023)	Foundation/hearsay
DJX2-0229	Keith and Jerri Mitchell Nutrient Management Plan issued in 2007 (2/22/2007)	Foundation/hearsay/relevance
DJX2-0230	KD Farms Nutrient Management Plan expiring 2027 (4/25/2023)	Foundation/hearsay/relevance

Exhibit Number	Description	Objections (If Any)
DJX2-0231	Expert Report of Nigel Pickering (11/2024)	Hearsay/foundation
DJX2-0232	All figures, charts, and exhibits included in the Expert Report of Nigel Pickering (11/2024)	Hearsay/foundation/improper group exhibit
DJX2-0233	Defendants reserve the right to utilize any exhibit identified on any party's exhibit list produced for the upcoming trial or the September 2009 trial.	
DJX2-0234	George's 05/22/06 Discovery Responses - Redlined	Hearsay/relevance
DJX2-0235	Appendix A to OKAG Proposed FFCL - Redlined	Foundation/relevance/hearsay
DJX2-0236	Last two years of broiler placements on Kenneth Glenn farm (11/14/2024)	Foundation/hearsay
DJX2-0237	Last two years of broiler placements on Ricky Reed farm (11/14/2024)	Foundation/hearsay
DJX2-0238	Last eggs received from Ritter Farm / Elm Farm houses 1, 3 & 4 (11/14/2024)	Foundation/hearsay
DJX2-0239	Last eggs received from Ritter Farm / Elm Farm house 2 (11/14/2024)	Foundation/hearsay
DJX2-0240	Washington County, AR Assessor Report on Ritter Farm Parcel: 830-38017-100	Foundation/hearsay
DJX2-0241	Washington County, AR Assessor Report on Ritter Farm Parcel: 830-38008-000	Foundation/hearsay
DJX2-0242	Washington County, AR Assessor Report on Ritter Farm Parcel: 750-00776-000	Foundation/hearsay
DJX2-0243	Washington County, AR Assessor Report on Ritter Farm Parcel: 750-00768-000	Foundation/hearsay
DJX2-0244	ActDataScout property map locations for all four parcels for Ritter Farm	Foundation/hearsay
DJX2-0245	Last two years of broiler placements on Morrison North Farm (11/14/2024)	Foundation/hearsay
DJX2-0246	Last two years of broiler placements on Morrison South Farm (11/14/2024)	Foundation/hearsay
DJX2-0247	Washington County, AR Assessor Report on Morrison Farm Parcel: 815-33682--900	Foundation/hearsay
DJX2-0248	Plat Application for former Morrison Farm	Foundation/hearsay
DJX2-0249	Springdale City Planning Commission Agenda on Elmdale Valley Estates - former Morrison Farm	Foundation/hearsay
DJX2-0250	Simmons Food, Inc. Table of State Identified Growers: Inactive at or Post-Trial	Foundation/hearsay/relevance

Exhibit Number	Description	Objections (If Any)
DJX2-0251	Oklahoma Department of Tourism Lake Tenkiller 2024-2025 Brochure	Foundation/hearsay
DJX2-0252	Oklahoma Department of Tourism Green Country 2024-25 Brochure	Foundation/hearsay
DJX2-0253	Travel OK Tenkiller State Park Site download	This is a website homepage with multiple links to a wide variety of other sites, and as such, it is impossible for the State to know what Defendants are seeking to admit. The State reserves all rights to object once Defendants identify what portion or portions of this website Defendants seek to use. Further object on foundation/hearsay grounds
DJX2-0254	Travel OK Tenkiller State Park Dive Park	Foundation/hearsay
DJX2-0255	Letter Austin Bennett to David and Jack Spears	Foundation/hearsay/relevance
DJX2-0256	Purchase Agreement for Zone 2 flotation licenses	Foundation/hearsay/relevance
DJX2-0257	Northwest Arkansas Gazette "This old river is clean."	Hearsay/foundation/relevance
DJX2-0258	Affidavit of Rusty Sikes - Director of Broilers, Small Birds of Simmons Foods, Inc. (11/18/2024)	Hearsay/foundation/relevance
DJX2-0259	2019 Arkansas Natural Resources Commission, Final Report on County Registration	The State reserves all objections to the extent this exhibit has not been produced by Defendants.
DJX2-0260	2021 Arkansas Natural Resources Commission, Final Report on County Registration	The State reserves all objections to the extent this exhibit has not been produced by Defendants.
DJX2-0261	Memorandum of Agreement Between Oklahoma and Arkansas (11/14/2018)	Foundation/hearsay/relevance
DJX2-0262	Oklahoma Concentrated Animal Feeding Operations Act, Okla. Stat. tit. 2, § 20.40, et seq. (effective 11/1/2024)	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues/relevance

Exhibit Number	Description	Objections (If Any)
DJX2-0263	Oklahoma Registered Poultry Feeding Operations Act, Okla. Stat. tit. 2, § 10-9 (effective 8/29/2024)	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues/relevance
DJX2-0264	Oklahoma Poultry Waste Applicators Certification Act, Okla. Stat. tit. 2, § 109.16, et seq. (2024)	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues
DJX2-0265	Oklahoma Conservation Commission, Illinois River Watershed Management Plans Second Stakeholder Meeting Summary (5/18/2023)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance
DJX2-0266	Oklahoma Conservation Commission, Excerpt from the 3rd IRWP Stakeholder Meeting, YouTube (9/7/2023), https://www.youtube.com/watch?v=CsDrOPuIv0g	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay
DJX2-0267	Oklahoma Conservation Commission, Voluntary, Non-Regulatory Watershed Management Plan for the Illinois River Watershed, 4th Stakeholder Meeting (6/25–26/2024)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay
DJX2-0268	Arkansas Department of Agriculture, Illinois River Watershed Management Plans Third Stakeholder Meeting Summary (8/10/2023) – DRAFT with Comments	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance
DJX2-0269	“Less Than 10% Poultry Waste Hauled Outside IRW” (State's Demonstrative 130 from 2009 Trial)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance to the extent this information is pre-2010/relevance/undisclosed expert opinion/improper 1006

Exhibit Number	Description	Objections (If Any)
DJX2-0270	Talking Points on Differences Between Arkansas and Oklahoma SWAT Models for the IRW (with Comments)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/completeness/undisclosed expert opinion/relevance
DJX2-0271	S. Phillips, Conservation District Training: 2022 Litter Transfer Program (1/25 & 27/2022)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay
DJX2-0272	Texas A&M Agrilife Research Presentation, Comparison of Inputs and Outputs Between the UIRW and IRB Models with Comments (2/15/2024)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance
DJX2-0273	Email from S. Phillips to L. Kindberg & T. Wentz, "FW: Maybe One of the Most Useful Presentations on Legacy P in Soils I've Ever Seen" (8/22/2024)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay
DJX2-0274	U.S. EPA, In-Depth Nonpoint Source Success Story, Cooperative Efforts Build Trust While Reducing Pollution (2020)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay
DJX2-0275	Text of Oklahoma Enrolled Senate Bill No. 1424 (5/30/2024)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance Improper exhibit for resolution of factual issues
DJX2-0276	Oklahoma Conservation Commission, Excerpt from the IRWP Stakeholders' Meeting 10/11/22, YouTube (10/26/2022), https://www.youtube.com/watch?v=uxCgbWhbHvM	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/incomplete to the extent this exhibit is an excerpt

DJX2-0277	Oklahoma Conservation Commission, 2nd IRWP Stakeholder Meeting, YouTube (7/24/2023), https://www.youtube.com/watch?v=5Cba4WZ2L_8	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay
DJX2-0278	Okla. Stat. tit. 2, § 10-9.1. Short title–Oklahoma Registered Poultry Feeding Operations Act–Definitions	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues/relevance
DJX2-0279	Okla. Stat. tit. 2, § 10-9.3. Registration	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues
DJX2-0280	Okla. Stat. tit. 2, § 10-9.7. Utilization of Best Management Practices–Nutrient Management Plans–Soil Testing–Carcassdisposal Plan	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues
DJX2-0281	Okla. Stat. tit. 2, § 10-9.11. Violations-Criminal and Administrative Penalties-Injunctions	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues
DJX2-0282	Okla. Stat. tit. 2, § 10-9.17. Applicator's Certificates–Application–Renewal– Violation– Fees	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues
DJX2-0283	Okla. Stat. tit. 2, § 20-44. Mandatory and Voluntary Licensure–Designation of Operations	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues
DJX2-0284	Okla. Stat. tit. 2, § 20-40. Short Title–Oklahoma Concentrated Animal Feeding Operations Act–Purpose	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues
DJX2-0285	Expert Report of Shannon Phillips (11/2024)	Untimely filed exhibit under Court's scheduling order.Foundation/hearsay
DJX2-0286	Comparison showing differences between versions of Okla. Stat. tit. 2, § 10-9.19 (Land Application of Poultry Waste-Tests-Rate-Rules)	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues
DJX2-0287	Registered Poultry Feeding Operations, Okla. Admin. Code § 35:17-5, et seq. (2024)	Untimely filed exhibit under Court's scheduling order. Improper exhibit for resolution of factual issues/relevance

DJX2-0288	Hunter, Lake Tenkiller 'Clear Water Paradise', CherokeePhoenix.org (6/28/2019)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay
DJX2-0289	Statement of Joint Principles and Actions (12/18/2003)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance to the extent this information is pre-2010
DJX2-0290	J. Williams & J.G. Arnold, A System of Hydrologic Models (1993)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay to the extent Defendants intend to move literature/publications into evidence/incomplete to the extent there is no information regarding where or if this information was published/if unpublished, undisclosed opinion/relevance
DJX2-0291	Nash, Effective Sediment-Transporting Discharge from Magnitude-Frequency Analysis, 102 J. Geology 79-95 (1994)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay to the extent Defendants intend to move literature/publications into evidence
DJX2-0292	J.G. Arnold, et al., Large Area Hydrologic Modeling and Assessment Part I: Model Development, 34 JAWRA 73 (1998)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay to the extent Defendants intend to move literature/publications into evidence/relevance

DJX2-0293	S.L. Neitsch, et al., Soil & Water Assessment Tool Theoretical Documentation Version 2009, Texas A&M (2011)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay to the extent Defendants intend to move literature/publications into evidence/relevance
DJX2-0294	J.G. Arnold, et al., SWAT: Model Use, Calibration, and Validation, 55 Transactions of the ASABE 1491–1508 (2012)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay to the extent Defendants intend to move literature/publications into evidence/relevance
DJX2-0295	M. Baker Jr., Inc., Final Setup, Calibration, and Validation for Illinois River Watershed Nutrient Model and Tenkiller Ferry Lake EFDC Water Quality Model (8/7/2015)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay to the extent Defendants intend to move literature/publications into evidence/relevance
DJX2-0296	R. King et al., Final Report to Governors from the Joint Study Committee & Scientific Professionals (12/19/2016)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay
DJX2-0297	A. Mittelstet, et al., Using SWAT to Enhance Watershed-based Plans to Meet Numeric Water Quality Standards, Sustainability of Water Quality & Ecol. (2016)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay to the extent Defendants intend to move literature/publications into evidence/relevance

DJX2-0298	Oklahoma Water Resources Board Staff Report, Illinois River Watershed Total Phosphorus Criterion Revision (12/2/2020)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay
DJX2-0299	E. Grantz & B. Haggard, Arkansas Water Resource Center, Constituent Loads and Trends in the Upper Illinois River Watershed: A Nonpoint Source Management Program Priority Watershed (2023)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay
DJX2-0300	Michael Baker Int'l, Draft Illinois River Watershed HSFP Model Updates Technical Support Document (7/18/2023)	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance
DJX2-0301	Illinois River Basin (IRB) Flow and Water Quality Presentation	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance.
DJX2-0302	Tahlequah Total Suspended Solids – Historic	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance to the extent the information is pre-2010
DJX2-0303	USGS Flow Combined	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance to the extent the information is pre-2010
DJX2-0304	USGS Water Quality Compiled – 20241017	Untimely filed exhibit under Court's scheduling order. Foundation/hearsay/relevance to the extent the information is pre-2010

DJX2-0305	Wastewater Treatment Plant – Monthly Load	Untimely filed exhibit under Court’s scheduling order. Foundation/hearsay/relevance to the extent the information is pre-2010
DJX2-0306	Wastewater Treatment Plant – Historic	Untimely filed exhibit under Court’s scheduling order. Foundation/hearsay/relevance to the extent the information is pre-2010
DJX2-0307	Expert Report of Lance Phillips (11/18/2024)	Untimely filed exhibit under Court’s scheduling order. Foundation/hearsay
DJX2-0308	Arkansas (Benton & Washington Counties) Litter Amount in Tons Chart (2014–2023)	Untimely filed exhibit under Court’s scheduling order. Foundation/hearsay/improper 1006 exhibit

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of December 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the ECF registrants with entries of appearance filed of record.

s/ M. David Riggs
M. David Riggs